

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

KIDANEMARIAM KASSA,

Plaintiff,

vs.

**FULTON COUNTY, GEORGIA,
PAUL H. HOWARD, officially &
individually,
ANTIONETTE STEPHENSON,
individually,
PIERRE EASLEY, individually, and
JOHN DOE, officially & individually,**

Defendants.

CIVIL ACTION FILE NO.

1:17-CV-02068-AT

JURY TRIAL REQUESTED

**PLAINTIFF’S RESPONSE TO DEFENDANTS FULTON COUNTY,
DISTRICT ATTORNEY PAUL HOWARD, ASSISTANT DISTRICT
ATTORNEY ANTOINETTE STEPHENSON, INVESTIGATOR PIERRE
EASLEY AND JOHN DOE’S MOTION TO DISMISS PURSUANT TO FED.
R. CIV. P. 12 (b) (1) and 12 (b) (6)**

COMES NOW PLAINTIFF KIDADEMARIAM KASSA (“Plaintiff”) and by
and through his undersigned counsel of record and files this RESPONSE TO
DEFENDANTS FULTON COUNTY, DISTRICT ATTORNEY PAUL HOWARD,
ASSISTANT DISTRICT ATTORNEY ANTOINETTE STEPHENSON,
INVESTIGATOR PIERRE EASLEY AND JOHN DOE’S MOTION TO DISMISS
PURSUANT TO FED. R. CIV. P. 12 (b) (1) and 12 (b) (6)

Plaintiff respectfully requests that this Honorable Court DENY Defendants' Motion and FIND that Plaintiff's Amended Complaint pleads a claim upon which relief can be granted.

Respectfully submitted this 13th day of November, 2017.

/S/ TIFFANY WILLIAMS ROBERTS

Tiffany Williams Roberts

Bar No. 791208

235 Peachtree Street, Suite 400

Atlanta, Georgia 30303

(404) 287-2090 – telephone

(678) 965-1790 – facsimile

troberts@tiffanywroberts.com

CERTIFICATION

Counsel for Plaintiff certifies that the foregoing Complaint complies with the font and point size requirements of Local Rule 5.1 (C).

/S/ TIFFANY WILLIAMS ROBERTS

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 13, 2017, I have electronically filed the foregoing PLAINTIFF'S RESPONSE TO DEFENDANTS FULTON COUNTY, DISTRICT ATTORNEY PAUL HOWARD, ASSISTANT DISTRICT ATTORNEY ANTOINETTE STEPHENSON, INVESTIGATOR PIERRE EASLEY AND JOHN DOE'S MOTION TO DISMISS PURSUANT TO FED. R. CIV. P. 12 (b) (1) and 12 (b) (6) with the Clerk of Court using the CM/ECF system which will provide electronic notification to the following attorney of record:

Ashley J. Palmer
OFFICE OF THE FULTON COUNTY ATTORNEY
141 Pryor Street, S.W., Suite 4038
Atlanta, Georgia 30303

(404) 612-0246 (office); (404) 730-6324 (facsimile)

This the 13th day of November, 2017.

/S/TIFFANY WILLIAMS ROBERTS

Tiffany Williams Roberts

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